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6 **LEAD ATTORNEY IN CHARGE FOR**
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12 **LOCAL COUNSEL:**
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18 *Additional counsel on signature page.*

19 IN THE UNITED STATES DISTRICT COURT
20 FOR THE DISTRICT OF ARIZONA

21 Ivonne Carbajal, individually and on behalf
22 of all others similarly situated,

No.: CV-24-01030-PHX-DLR

23 Plaintiff,

24 v.

25 Lowe's Home Centers, LLC, a North
26 Carolina limited liability company, and
27 Salesforce, Inc., a Delaware corporation,

**STIPULATION FOR EXTENSION OF
BRIEFING SCHEDULE ON
DEFENDANTS' MOTIONS TO
DISMISS**

28 *(First Request)*

Defendants.

1 Plaintiff Ivonne Carbajal and Defendants Lowe's Home Centers LLC and
2 Salesforce, Inc., by their attorneys, respectfully stipulate pursuant to LRCiv 7.3 to request
3 an extension of the deadlines for the filing of Plaintiff's opposition briefs to Defendants'
4 motions to dismiss the First Amended Class Action Complaint, *see* ECF Nos. 20 & 21 (the
5 "Motions to Dismiss"), and for Defendants' reply briefs in support of the Motions to
6 Dismiss. The Motions to Dismiss were filed on July 25, 2024, and because both motions
7 raise a lack of personal and subject matter jurisdiction as grounds for dismissal, Plaintiff's
8 opposition briefs are presently due on August 26, 2024. LRCiv 12.1(b).

9 On August 23, 2024, Plaintiff's counsel contacted Defendants' counsel seeking their
10 position on an extension of time to September 30, 2024, to file her responses to the Motions
11 to Dismiss. Plaintiff's counsel communicated to Defendants that they had been working
12 diligently to prepare Plaintiff's response briefs to Defendants' motions to dismiss, but
13 require additional time to do so due to, *inter alia*, previously set travel and work schedules
14 in other work-related matters. Defendants agree to this request and respectfully seek a
15 concomitant extension of their deadline to file replies in support of the Motions to Dismiss
16 through November 1, 2024.

17 The parties previously stipulated to extend the deadlines for Defendants to answer
18 Plaintiff's original complaint and the Court granted those extensions, *see* ECF Nos. 11 &
19 13, but no prior extension of the briefing deadlines for the Motions to Dismiss has been
20 requested or entered.

21 WHEREFORE, the parties respectfully request that this Court enter an order setting
22 September 30, 2024 as the deadline for Plaintiff to file her opposition briefs to the Motions
23 to Dismiss and setting November 1, 2024 as the deadline for Defendants to file their
24 respective reply briefs in support of the Motions to Dismiss.

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26 **IT IS SO STIPULATED.**
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1 **LAW OFFICE OF JAMES X. BORMES, P.C.**
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on August 26, 2024, he caused the foregoing Stipulation for Extension of Briefing Schedule on Defendants' Motions to Dismiss to be filed via the CM/ECF system, which will send service of such filing upon all counsel of record.

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